

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:

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: Chapter 9

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CITY OF DETROIT, MICHIGAN,

: Case No. 13-53846

:

Debtor.

: Hon. Steven W. Rhodes

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**NOTICE OF MOTION FOR COSTS RELATING  
TO CLAWBACK OF DEBTOR'S DOCUMENT PRODUCTION**

**PLEASE TAKE NOTICE** that on June 16, 2014, Assured Guaranty Municipal Corp. filed the *Motion for Costs Relating to Clawback of Debtor's Document Production* (the "Motion" in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") seeking costs from the Debtor, the City of Detroit, Michigan relating to the Bankruptcy Court's May 13, 2014 *Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief*.

**PLEASE TAKE FURTHER NOTICE** that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the Motion or you want the Bankruptcy Court to consider your views on the Motion, by July 2, 2014, you or your attorney must:

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to<sup>1</sup>:

United States Bankruptcy Court  
Theodore Levin Courthouse  
231 West Lafayette Street  
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also serve a copy of any objection or response upon:

Lawrence A. Larose  
Samuel S. Kohn  
Robert Schwinger  
CHADBOURNE & PARKE LLP  
30 Rockefeller Plaza  
New York, NY 10112  
Telephone: (212) 408-5100  
llarose@chadbourne.com  
skohn@chadbourne.com  
rschwinger@chadbourne.com

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

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<sup>1</sup> A response must comply with F. R. Civ. P. 8(b), (c) and (e).

**PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.**

Dated: June 18, 2014

By: /s/ Lawrence A. Larose  
Lawrence A. Larose  
Samuel S. Kohn  
Robert A. Schwinger  
CHADBOURNE & PARKE LLP  
30 Rockefeller Plaza  
New York, NY 10112  
Telephone: (212) 408-5100  
llarose@chadbourne.com  
skohn@chadbourne.com  
rschwinger@chadbourne.com

*Counsel for Assured Guaranty  
Municipal Corp.*